

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re,	Bankruptcy No. 23-21577-CMB
KIMBERLY J. BRINK,	Chapter 13
Debtor,	
DIRECT RENT TO OWN BARNS, LLC,	
Movant,	re doc. 69
v.	
KIMBERLY J. BRINK, AND RONDA J. WINNECOUR, Trustee, Respondents.	

**STIPULATION TO RESOLVE MOTION FOR RELIEF FROM THE AUTOMATIC
STAY**

Pursuant to the agreement of Direct Rent to Own Barns, LLC (hereinafter “Direct”) and Kimberly J. Brink (“Debtor”), Direct shall have a secured claim as it relates to the 12x32 New Utility Shed, Serial #: 1232-051721-02567 (“Shed”). Direct shall be paid according to the following treatment during the term of the Debtor’s Chapter 13 Amended Plan. Direct shall have a secured claim in the Shed of \$8,000.00 to be paid in full within the Debtor’s Amended Plan.

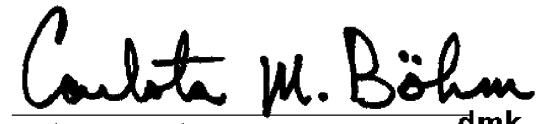
It is further agreed that the said Chapter 13 Plan dated May 2, 2024 shall incorporate the terms of this Stipulation as it relates to Direct’s claim or if the Debtor files an amended Chapter 13 Plan, the amended Chapter 13 Plan shall incorporate the terms of this Stipulation as it relates to Direct’s claim.

Direct shall retain its leased ownership of the Shed until the Debtor’s Chapter 13 Amended Plan has been fully completed or until it has been paid the full amount to which it is

entitled to under applicable non-bankruptcy law, whichever occurs earlier. Upon payment in accordance with these terms and successful completion of the Chapter 13 Amended Plan by the Debtor, Direct shall release the title on the Shed.

Debtor hereby releases any and all claims that it may have regarding the Shed including but not limited to damage, alleged violation of the stay and any other claims the Debtor may have at this time or in the future.

This stipulation shall become null and void, without further Order or Hearing, if the Debtor's underlying Chapter 13 Bankruptcy case is converted to a Chapter 7 case or if the underlying Chapter 13 case is dismissed.


Carlotta M. Bohm
United States Bankruptcy Judge

AGREED TO:

/s/ Brian C. Thompson
Brian C. Thompson, Esquire
PA I.D. 91197
Thompson Law Group, P.C.
125 Warrendale Bayne Road, Suite 200
Warrendale, PA 15086
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com
Attorney for the Debtor/Plaintiff

FILED
7/12/24 3:55 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

/s/ Keri P. Ebeck
Keri P. Ebeck Esquire
Attorney I.D. #91298
601 Grant Street, 9th Floor
Pittsburgh, PA 15219
(412)456-8112 Telephone
(412)456-8135 Facsimile
kebeck@bernsteinlaw.com
Attorney for Direct Rent to Own Barns, LLC

In re:

Kimberly J. Brink

Debtor

Case No. 23-21577-CMB

Chapter 13

District/off: 0315-2

User: auto

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Date Rcvd: Jul 12, 2024

Form ID: pdf900

Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol Definition

- + Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 14, 2024:

Recip ID	Recipient Name and Address
db	+ Kimberly J. Brink, 159 Timber Lane, Parker, PA 16049-2533

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 14, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 12, 2024 at the address(es) listed below:

Name	Email Address
Brian C. Thompson	on behalf of Plaintiff Kimberly J. Brink bthompson@ThompsonAttorney.com blemon@thompsonattorney.com;bthompson@ecf.courtdrive.com;mgillespie@thompsonattorney.com;kfinke@thompsonattorney.com;mrowe@thompsonattorney.com;thompson.brianr111424@notify.bestcase.com
Brian C. Thompson	on behalf of Debtor Kimberly J. Brink bthompson@ThompsonAttorney.com blemon@thompsonattorney.com;bthompson@ecf.courtdrive.com;mgillespie@thompsonattorney.com;kfinke@thompsonattorney.com;mrowe@thompsonattorney.com;thompson.brianr111424@notify.bestcase.com
Denise Carlon	on behalf of Creditor CU Member Mortgage a division of Colonial Savings, F.A. dcarlon@kmllawgroup.com
Keri P. Ebeck	on behalf of Creditor USX Federal Credit Union kebeck@bernsteinlaw.com btemple@bernsteinlaw.com;aepiscopo@bernsteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bernsteinlaw.com
Keri P. Ebeck	

District/off: 0315-2

Date Rcvd: Jul 12, 2024

User: auto

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Page 2 of 2

Total Noticed: 1

on behalf of Defendant ONEMAIN FINANCIAL GROUP LLC kebeck@bersteinlaw.com,
btemple@bersteinlaw.com;aepiscopo@bersteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bersteinlaw.com

Keri P. Ebeck

on behalf of Creditor OneMain Financial Group LLC kebeck@bersteinlaw.com
btemple@bersteinlaw.com;aepiscopo@bersteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bersteinlaw.com

Keri P. Ebeck

on behalf of Creditor Direct Rent to Own Barns LLC kebeck@bersteinlaw.com,
btemple@bersteinlaw.com;aepiscopo@bersteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bersteinlaw.com

Office of the United States Trustee

ustpregion03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecl@chapter13trusteewdpa.com

TOTAL: 9